

Enclosure 2

December 2007

FINAL EAC Progress Report Document South Carolina's Comprehensive Maintenance Plan



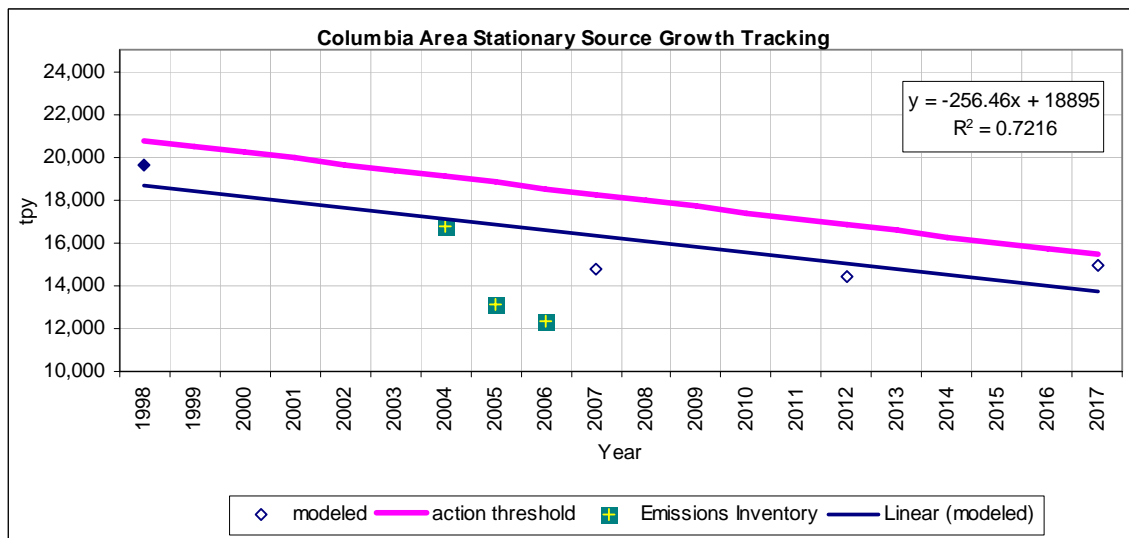
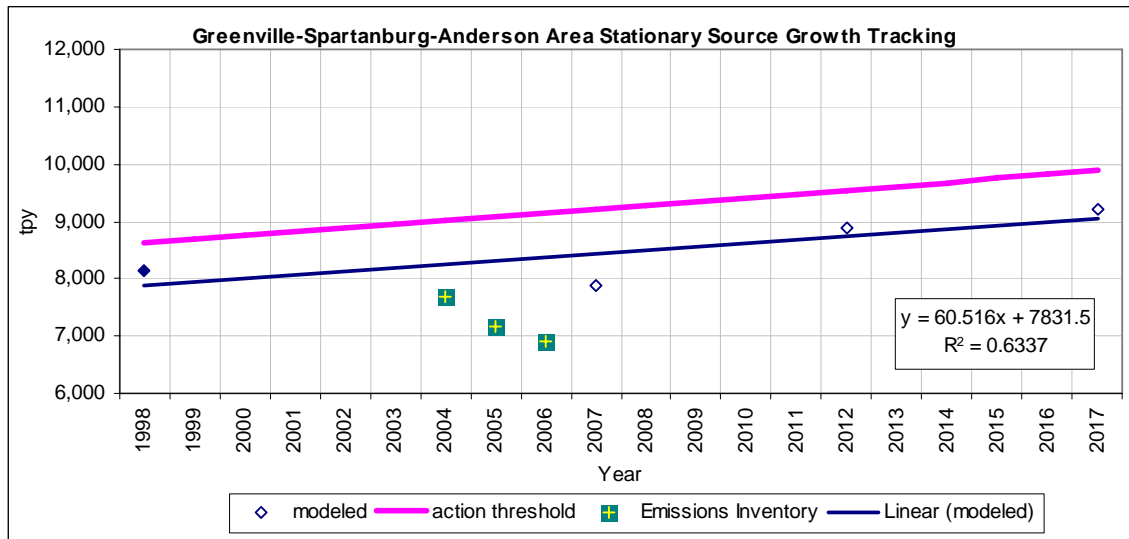
Enclosure 2
South Carolina's Ozone Early Action Compact
December 2007 Progress Report
Comprehensive Maintenance Plan

South Carolina has committed to a comprehensive maintenance plan. This commitment far exceeds the maintenance requirements in the EAC protocol. The South Carolina EAC maintenance plan is similar to the requirements for section 175A of the Clean Air Act, none of which are required for EAC areas. A Notice of General Public Interest was published in the *State Register* on May 27, 2005, scheduling a thirty-day public notice and comment period. A public hearing was held on June 30, 2005.

South Carolina's commitment included an annual review of growth (highway mobile and stationary NO_x sources) to ensure emission reduction strategies and growth are adequate as well as identification and quantification of federal, state, and/or local measures indicating sufficient reductions to offset growth estimates. Results of the first annual review, (December 2005) revealed that for both areas designated nonattainment with the effective date deferred, the actual emissions were lower than the forecasted modeled data and the 2004 VMT was well below the action trigger. The second annual review (December 2006) for both deferred areas, revealed the actual emissions remained lower than the forecasted modeled data and the 2005 VMT remained well below the action trigger. The third annual review (December 2007) for both deferred areas, once again revealed that the actual emissions remained lower than the forecasted modeled data and the 2006 VMT remained well below the action trigger.

Annual Review of Growth

The most recent emissions inventory (2006) was compared to the emissions used in the ozone modeling analysis with a base year of 1998. In order to compare the annual emissions to the assumptions made in the model, a regression equation for each deferred area was developed in order to forecast the emissions for years not modeled. The modeled data, forecasted data, the 10 percent “action level” and actual emissions for 2004, 2005 and 2006 were then plotted in order to determine whether the actual emissions were still comparable to the ozone modeling assumptions. For both deferred areas, the actual emissions were lower than the forecasted modeled data. The ozone modeling analysis could not be run on partial counties, so for the Columbia deferred area, the review of growth took the county wide emissions into account. Therefore, the number for the Columbia deferred area represents a conservative estimate of the emissions.



The most recent annual VMT (2006) was compared with the projected VMT from the ozone modeling analysis with a base year of 1998. The VMT for analysis years 1998, 2007, 2012 and 2017 for Greenville, Spartanburg and Anderson Counties was combined and a trend line established. The actual 2004, 2005 and 2006 VMT for the three-counties was slightly below the trend line and well below the action trigger. Because full county VMT data was used for the ozone modeling analysis, it was necessary to use combined full county data from Richland and Lexington Counties to represent the Columbia nonattainment area. For the Columbia and Greenville deferred areas, the review revealed that the 2004, 2005 and 2006 VMT was slightly below the modeled trend line.

